



RE: Essroc Response to EPA letter December 11, 2012 concerns

Angel Berrios

to:

Umesh Dholakia

02/08/2013 03:41 PM

Hide Details

From: Angel Berrios <Angel.Berrios@erm.com>

To: Umesh Dholakia/R2/USEPA/US@EPA

History: This message has been replied to.

Umesh,

It is taking me more time than I expected to write the enforceable conditions for the scenarios. Hopefully I will have them for next week.

Have a nice weekend.

Angel

From: Dholakia.Umesh@epamail.epa.gov [Dholakia.Umesh@epamail.epa.gov]

Sent: Thursday, January 31, 2013 3:27 PM

To: Angel Berrios

Subject: RE: Essroc Response to EPA letter December 11, 2012 concerns

That's fine. When a source prefers to get a permit for more than one scenario- the permitting people need to ensure that the terms are practically enforceable and the source should be able to implement those terms....it becomes complicated- as you know.

From: Angel Berrios <Angel.Berrios@erm.com>

To: Umesh Dholakia/R2/USEPA/US@EPA

Cc: "beatriz.rivera@essroc.com" <beatriz.rivera@essroc.com>, Jose Hernandez <Jose.Hernandez@erm.com>, Steve Cullen

<Steve.Cullen@erm.com>

Date: 01/31/2013 02:27 PM

Subject: RE: Essroc Response to EPA letter December 11, 2012 concerns

Umesh,

Just to let you now that I received your message and I am working to provide you the information requested. I will have the information early next week. To answer one of your questions regarding the use of biomass yes it will be co-processed with carbon and oil and gradually substitute the fossil fuel with the biomass.

Angel

From: Dholakia.Umesh@epamail.epa.gov [Dholakia.Umesh@epamail.epa.gov]

Sent: Wednesday, January 30, 2013 9:23 AM

To: Angel Berrios

Cc: beatriz.rivera@essroc.com; Jose Hernandez; Steve Cullen

Subject: RE: Essroc Response to EPA letter December 11, 2012 concerns

Angel:

GM!

Please describe how ESSROC will comply with the ANNUAL production limits for two fuel use scenarios by monitoring the production and fuel heat input on a daily basis. ESSROC also proposes to use 100% biomass - does not restrict biomass use to an annual fuel use (in MMBtu) to say 20% or 30%...etc. Further, it is not clear if ESSROC will mix biomass with coal/oil or will use entirely biomass or entirely coal+oil on a given day or given week....I am nearly sure that biomass will be mixed with coal and/or waste oil- but ESSROC will need to confirm it. Thanks.

Umesh

From: Angel Berrios <Angel.Berrios@erm.com>

To: Umesh Dholakia/R2/USEPA/US@EPA

Cc: "beatriz.rivera@essroc.com" <beatriz.rivera@essroc.com>, Jose Hernandez <Jose.Hernandez@erm.com>, Steve Cullen <Steve.Cullen@erm.com>

Date: 01/30/2013 08:42 AM

Subject: RE: Essroc Response to EPA letter December 11, 2012 concerns

Umesh,

Good Morning!!!

Essroc would want to maintain the higher permitted production limit of 682,550 clinker burning only coal or fuel oil in a given year; and just use the 579,763 limit if burning alternative fuels. The following are recommendations for monitoring, recordkeeping and reporting.

Monitoring:

- Daily Clinker production while burning coal or fuel oil (calculated from feed, unless clinker production is monitored)
- Daily Clinker production while burning alternative fuels (calculated from feed, unless clinker production is monitored)
- Daily Heat input from each type of fuel burned

Recordkeeping:

- Monthly Clinker production while burning coal or fuel oil (calculated from feed, unless clinker production is monitored)
- Monthly Clinker production while burning alternative fuels (calculated from feed, unless clinker production is monitored)
- Monthly Heat input from each type of fuel burned

Reporting:

- Quarterly Clinker production while burning coal or fuel oil (calculated from feed, unless clinker production is monitored)
- Quarterly Clinker production while burning alternative fuels (calculated from feed, unless clinker production is monitored)

If you have any comments or need more information you can contact me.

Angel

Angel O. Berríos Silvestre, P.E.
 Engineer Consultant - Air Resources
 Environmental Resources Management
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From: Dholakia.Umesh@epamail.epa.gov [Dholakia.Umesh@epamail.epa.gov]

Sent: Tuesday, January 29, 2013 10:25 AM

To: Angel Berrios

Cc: beatriz.rivera@essroc.com; Jose Hernandez; Steve Cullen

Subject: Re: Essroc Response to EPA letter December 11, 2012 concerns

Angel:

The footnote 1 on Page 1 of ESSROC's letter states: "The clinker production will be maintained at 682,550 tons/year using coal and used oil as fuel as stated in the current permit". Please clarify the relationship to this statement with the 579,763 t/y clinker limit.....If there will be two distinct production limits- please provide associated M/R/R requirements that ESSROC would like to comply with. Thanks.

Umesh

From: Angel Berrios <Angel.Berrios@erm.com>

To: Umesh Dholakia/R2/USEPA/US@EPA

Cc: "beatriz.rivera@essroc.com" <beatriz.rivera@essroc.com>, Steve Cullen <Steve.Cullen@erm.com>, Jose Hernandez <Jose.Hernandez@erm.com>

Date: 01/21/2013 11:22 AM

Subject: Essroc Response to EPA letter December 11, 2012 concerns

Umesh,

In response to your December 11, 2012 letter attached please find an advance copy of the letter answering to your concerns regarding the use of alternative fuel at Essroc facility. The letter will be mailed to your office. If you have any questions do not hesitate to contact me.

Angel O. Berríos Silvestre, P.E.
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cel.: 787-383-2696 [attachment "0171815 Response to EPA Region 2 Comments Essroc Alternative Fuel.pdf" deleted by Umesh Dholakia/R2/USEPA/US]